



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 10**


1200 Sixth Avenue  
Seattle, Washington 98101

May 13, 1993

**Reply to the  
Attention of M/S AT-083**

**MEMORANDUM**

**SUBJECT:** Withdrawal of TSCA Referral for Administrative Civil Penalty: Inland Power and Light Co., Spokane, Washington: TSCA Docket Number 1093-03-11-2615

**FROM:**   
Gil Haselberger, Chief  
Toxic Substances Section

**TO:** Joseph Ryan, Assistant Regional Counsel

Bill Hedgebeth of my staff received a letter dated May 3, 1993, from Inland Power & Light Company, in response to his April 26, 1993, letter requesting clarification of what PCB waste was manifested on Manifest Number 09251. Inland Power's response appears to indicate that PCB waste identified on line 11(c) of this manifest was not actually manifested to Ross Electric, but remained at Inland Power's facility to be later manifested directly to EnviroSAFE Services of Idaho, Inc. This was apparently why "0" was listed as the "quantity" of PCB waste on that line.

With the receipt of this information, it appears that no regulated PCB waste was sent to Ross Electric of Washington, Inc., by Inland Power & Light Company, with the shipment identified on this manifest. Therefore, we are withdrawing our recommendation to issue an administrative complaint against Inland Power & Light Company.

A copy of the May 3, 1993, letter is attached for your information.

**Attachment**



**Inland  
Power & Light Company**

320 East Second Avenue  
P.O. Box 4429  
Spokane, Washington 99202  
Telephone (509) 747-7151  
FAX (509) 747-7987



PESTICIDES & TOXIC SUBSTANCES  
BRANCH — EPA REGION 10

May 3, 1993

William Hedgebeth  
U.S. Environmental Protection Agency  
Toxic Substances Section  
1200 Sixth Avenue  
Seattle, Washington 98101

Dear Mr. Hedgebeth:

In response to your letter dated April 26, 1993, Manifest number 09251. Manifest 09251 was generated with the assumption that all federally regulated units would be shipped to ESII on December 13, 1991. Due to circumstances beyond our control all federally regulated units were not shipped on this date to ESII.

As you see on line 11B and 11C dangerous waste was described, but on line 12B and 12C zeros indicate that no containers were shipped.

I believe you will find all is in order with this disposal packet. If you have any questions, please call me at (509) 747-7151 ext. 211.

Sincerely,

INLAND POWER & LIGHT COMPANY

Bill E. Byrd  
Shop Foreman  
P.C.B. Coordinator

# DISPOSAL SUMMARY — D# 09251

## (ANNUAL DOCUMENT LOG - PART 2)

1. DISPOSAL CONTRACTOR/BROKER: Ross Electric of WA.

Phone: 748-6932 Contact: Bob Ross EPA I.D. # WAD 980835268

2. SHIPMENT INFORMATION:

A. Initial Shipping Date(s): 12-13-91  
B. Initial Manifest Number(s): 09251  
C. Drivers' Names: Gerald Ross  
D. Primary Destination: Chelalis

3. TRANSPORTATION COMPANY: Ross Electric of WA.

Phone: 748-6932 Contact: Bob Ross EPA I.D. # WAD 980835268

\*Note: If an independent transportation company (not owned by the disposal contractor/broker/generator) is contracted to deliver PCB waste, complete the following information to verify receipt of the PCB waste by the designated facility in accordance with 40 CFR Part 761.208(a)(4).

\*Verification of receipt of PCB waste made on 12-16, 19 91

☒ Phone Call ☐ Letter ☐ Fax ☐ Other

Person Contacted: Bill Byrd Title: Shop Foreman

Receipt of Waste Confirmed: ☒ Yes ☐ No

Signed: Bill E Byrd Date: 12-16-91

4. ITEMS TO BE SHIPPED FOR DISPOSAL: (See Attached Manifest I.D. List)

A.	<u>0</u>	PCB Large Capacitors (non-leaking)	
B.	<u>0</u>	PCB Transformers (undrained w/	total gallons)
C.	<u>0</u>	PCB Regulators (undrained w/	total gallons)
D.	<u>0</u>	PCB OCRs/OCBs (undrained w/	total gallons)
E.	<u>0</u>	PCB-Contaminated Units (undrained w/	total gallons)
F.	<u>0</u>	Drained Carcasses (drained of free-flowing liquids)	
G.	<u>0</u>	Gallons PCB Fluids (contained in	drums or bulk)
H.	<u>0</u>	Gallons Non-PCB Fluids (contained in	drums or bulk)
I.	<u>0</u>	Pounds PCB Solids (dirt, debris, etc. in	drums)
J.	<u>0</u>	Pounds PCB Items (	in drums)
K.	<u>0</u>	Other PCBs &/or PCB Items: (specify:	

5. MANIFEST CHECKLIST: (✓)

A. ☒ Manifest I. D. # (up to 5 digits)  
B. ☒ Generator's address, phone, and EPA I.D. #  
C. ☒ Transporter's EPA I.D. #  
D. ☒ Designated Facility's address, phone, and EPA I.D. #  
E. ☒ Proper D.O.T. description of waste  
F. ☒ Manifest I.D. List filled-out and attached to manifest  
G. ☒ Copies of the manifest provided for the Generator, each Transporter, and the Designated Commercial Storage or Disposal Facility

## INVOICE

# Ross Electric of Wa., Inc.

Office Phone (206) 748-6932 Box 905

CHEHALIS, WASHINGTON 98532

Terms: Net Cash — No Discount

S  
O • Inland Power & Light Co.L  
D • P.O. Box 4429T  
O • Spokane, Wa. 99202

INVOICE NO 002914A

INVOICE DATE 12/24/91

DATE ORDER WRITTEN		YOUR ORDER NO. 71601		DATE SHIPPED		SHIPPED VIA		Prepaid <input type="checkbox"/> Collect <input type="checkbox"/>		SALESMAN		CODE NO.	
B.O.	ORDERED	SHIPPED	DESCRIPTION				UNIT PRICE		TOTAL				
			For Incineration of Transformers										
			24 Units	295 KVA		@ \$	2.00 KVA					\$590.00	
			For Incineration of Reclosers										
			16 Units			@ \$	15.00 Ea.					\$240.00	
			For Incineration of Waste Oil										
			2 drums	110 Gallons		@ \$	2.00 Gal.					\$220.00	
			<b>R E C E I V E D</b>										
			DATE <u>12-26-91</u>										
			ACCT. # _____										
			PMT. \$ _____										
											Subtotal		
											Sales Tax		
											Shipping Charges		
PAY THIS AMOUNT →										TOTAL		\$1,050.00	

THIS IS THE ONLY BILLING YOU WILL RECEIVE.  
PLEASE PAY FROM THIS INVOICE. TERMS: NET.  
NO MONTHLY STATEMENTS UNLESS REQUESTED.

(The amount payable under this invoice is the amount due the  
supplier and does not include any State and Local taxes if applicable  
on this transaction.)

RECEIVED BY

*Bill E. Boyd*  
SIGNATURE  
*Leck Seewer Super*  
TITLE

**UNIFORM HAZARDOUS  
WASTE MANIFEST**

1. Generator's US EPA ID No.

Manifest  
Document No.2. Page 1  
of 1Information in the shaded area  
is not required by Federal law

WA D 9 8 3 4 7 2 0 3 1 0 9 2 5 1

3. Generator's Name and Mailing Address

Inland Power & Light Co.  
Box 4429, Spokane, Wa. 99202

4. Generator's Phone ( 509 ) 747-7151

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name

ROSS ELECTRIC OF WA., INC.

6. US EPA ID Number

WA D 9 8 0 8 3 5 2 6 8

C. State Transporter's ID

D. Transporter's Phone 206-748-69

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

Ross Electric of Wash., Inc.  
1015 Logan Hill Road  
Chehalis, Wa. 98532

10. US EPA ID Number

WA D 9 8 0 8 3 5 2 6 8

G. State Facility's ID

H. Facility's Phone

(206) 748-5932

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

12. Containers

13. Total  
Quantity14. Unit  
Wt/Vol

Waste No.

a. HV

Dangerous Waste Liquid nos ORM-E  
NA9188 (Scrap Transformers) L/50 ppm

No.

Type

40

C/M

4600

K

W001

b.

Dangerous Waste Liquid nos ORM-E  
NA9188 (Scrap Transformers) L/500 ppm

No.

Type

10

C/M

10

K

W001

c.

Dangerous Waste Liquid nos ORM-E  
NA9188 (Transformers) O/500 ppm

No.

Type

10

C/M

10

K

W001

d.

Dangerous Waste nos ORM-e  
NA9188 (Waste Materials)

No.

Type

2

D/M

430

K

W001

J. Additional Descriptions for Materials Listed Above

a. Transformers L/50 ppm

b. Transformers L/500 ppm

c. Transformers O/500 ppm

d. Materials drummed L/50

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

Regulated materials re-manifested to 8811

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Month Day Year

Todd Hoffman FOR INLAND POWER &amp; LIGHT

Todd Hoffman for IPL

12/13/91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

GERALD ROSS

Gerald Ross

12/14/91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19

Printed/Typed Name

Signature

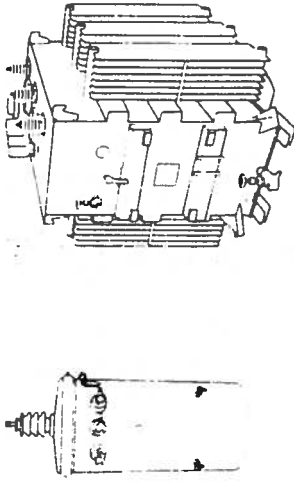
Month Day Year

Bob Ross

Bob Ross

1/21/92

EPA ID WAD# 980835268  
Incineration Permit No. -83-L-33R



## *ROSS ELECTRIC OF WASHINGTON, INC.* **CERTIFICATE OF INCINERATION**

Ross Electric of Washington, Inc. has incinerated the electrical materials received from INLAND POWER & LIGHT CO.

on the 13<sup>th</sup> day of DECEMBER 1991. As identified in Hazardous Waste Manifest # 09251 and hereby certifies such incineration as of this 24<sup>th</sup> day of DECEMBER 1991.

Generator Inland Power & Light Co. By *Bob Ross*

Address P.O. Box 4429 Title Secretary

Spokane, Wa. 99202

GERALD ROSS  
President

CURT ROSS  
Vice President

BOB ROSS  
Secretary/Treasurer



# Ross Electric of Wa., Inc.

P.O. Box 905  
Chehalis, Washington 98532  
Call Collect (206) 748-6932



## INLAND POWER & LIGHT CO.

MANIFEST NUMBER 09251  
ARRIVAL DATE 12/13/91

KVA	MAKE	SERIAL NUMBER	PPM
7.5	WEST.	645696	ND
7.5	WEST.	2402888	2
7.5	G.E.	9394253	ND
7.5	G.E.	C-311387	9
7.5	G.E.	C-307028	18
10	G.E.	9357017	ND
10	G.E.	D-402037-59p	18
10	G.E.	9292136	4
10	G.E.	B186608	13
10	G.E.	F683911-63K	4
10	WEST.	9461942	2
10	WEST.	6920554	ND
10	WEST.	2618432	4
10	RT&E	602014974	ND
10	RT&E	12905A2	ND
15	SPOKANE	S-680208C	33
15	G.E.	9795238	18
15	G.E.	K-516262K73A	ND
15	CENTRAL	D-402041-59P	18
15	CENTRAL	AL-7127-11	6
15	WEST.	2614323	2
25	G.E.	831081970	18
25	G.E.	H876593K70A	ND
25	WEST.	67AC2448	1

### RELOSERS NON-DETECTABLE

54025	56017	48189	54089
48701	60984	77168	239530
251305	69175	142473	141703
57653	141704	141702	141748

### 55 GALLON DRUMS

385-91 18 PPM  
418-91 ND PPM

## NATIONAL CHEM LAB PCB TEST REPORT

12/11/91

148  
INLAND POWER & LIGHT  
E. 320 SECOND AVE.  
SPOKANE, WA 99202  
Attn: BILL BYRD

NATIONAL CHEM LAB  
103 12TH S.W.  
EPHRATA, WA 98823  
GLENDA NELSON, Chemist

Lab Report #: E1120612 PO number: 71528

Below is a listing of the samples received on 12/06/91 together with the laboratory results on their respective PCB content. Please contact the lab at 509-754-5725 if you have any questions regarding these sample results.

UTILITY SERIAL NO.	COMPANY #	MISC.	AROCLOR	PPM	NCL #
✓ 8411076	365-91	GE 5	1260	239	OE1121744
✓ 6310261	366-91	C/C 10		ND	OE1121745
✓ 789359	367-91	LM 3		ND	OE1121746
✗ S680208C	368-91	SPOK 15	1254/60	33	OE1121747
✓ 46B124626	369-91	RES 15		ND	OE1121748
✓ D509951-60P	370-91	GE 7.5	1260	214	OE1121749
✗ 9394253	371-91	GE 7.5		ND	OE1121750
✓ G717166-66K	372-91	GE 25	1260	4	OE1121751
✗ AL-7127-11	374-91	CEN 15	1242/54	6	OE1121752
✗ 645696	375-91	WH 7.5		ND	OE1121753
✗ C311387	376-91	GE 7.5	1260	9	OE1121754
✓ E444843-62P	378-91	GE 7.5	1260	59	OE1121755
✓ 891105623	379-91	RTE 15		ND	OE1121756
✓ 086415039	380-91	ERM 15		ND	OE1121757
✓ 9-2140-00080-61	383-91	AC 50AMP	1242	587	OE1121758
✓ 55 GAL DRUM	385-91	TRANS OIL	1260	18	OE1121759
✗ 2402888	391-91	WH 7.5	1620	2	OE1121760
✓ 811133780	392-91	RTE 100		ND	OE1121761
✓ 811133778	393-91	RTE 100		ND	OE1121762
✓ 811133779	394-91	RTE 100		ND	OE1121763

Lab Report #:E1120612

Page 1

*Glenda Nelson*

*Sent for Disposal*  
*Repaired*

## NATIONAL CHEM LAB PCB TEST REPORT

12/11/91

UTILITY SERIAL NO.	COMPANY #	MISC.	AROCOR	PPM	NCL #
✓ A7312A15AA1	395-91	WH 15		ND	OE1121764
✕ 2614323	396-91	WH 15	1260	2	OE1121765
✓ 9292136	397-91	GE 10	1260	4	OE1121766
✕ 9857017	398-91	GE 10		ND	OE1121767
✓ 5953733	399-91	RTE 15	1254	5	OE1121768
✓ 7958750	400-91	GE 5	1260	747	OE1121769
✕ 12905A2	401-91	RTE 10		ND	OE1121770
✓ 0127320	402-91	AC 15	1260	1	OE1121771
✕ B186608	403-91	GE 10	1260	13	OE1121772
✕ 9461942	404-91	GE 10	1260	2	OE1121773
✕ 6920554	405-91	WH 10		ND	OE1121774
✓ 7141468	407-91	GE 3	1260	1040	OE1121775
✓ 155438	408-91	RTE 15		ND	OE1121776
✓ 881150636	409-91	RTE 10		ND	OE1121777
✕ 2618432	410-91	WH 10	1260	4	OE1121778
✓ 71AJ14924	411-91	WH 25	1242/54	6	OE1121779
✓ 732023318	412-91	RTE 15		ND	OE1121780
✓ 8457612	413-91	GE 7.5	1260	89	OE1121781
✓ 563962	414-91	LM 3	1260	1	OE1121782
✓ E994984-63P	415-91	GE 10	1260	85	OE1121783
✓ D569982-60P	416-91	GE 15	1260	87	OE1121784
✓ D430431-59P	417-91	GE 10	1260	82	OE1121785
✕ 55 GAL DRUM	418-91	RECLOS O1C		ND	OE1121786

*Glenda Wilson*

NATIONAL CHEM LAB PCB TEST REPORT

10/10/91

148  
INLAND POWER & LIGHT  
E. 320 SECOND AVE.  
SPOKANE, WA 99202  
Attn: BILL BYRD

NATIONAL CHEM LAB  
103 12TH S.W.  
EPHRATA, WA 98823  
GLENDA NELSON, Chemist

Lab Report #: E1100415 PO number: 71301

Below is a listing of the samples received on 10/04/91 together with the laboratory results on their respective PCB content. Please contact the lab at 509-754-5725 if you have any questions regarding these sample results.

UTILITY SERIAL NO.	COMPANY #	MISC.	AROCLOR	PPM	NCL #
<del>8749805</del>	<del>294-91</del>	<del>GE 150AMP</del>	<del>1214</del>	<del>89</del>	<del>OE110185</del>
8749805	295-91	GE 3		ND	OE110185
364056	296-91	WH 7.5	1260	1	OE110185
7840655	297-91	GE 3	1260	578	OE110186
3711006-10	298-91	CENT 10		ND	OE110186
6218835	299-91	GE 3	1260	420	OE110186
5341303	300-91	AC 15	1254	5	OE110186
5703805	301-91	GE 1.5	1260	91	OE110186
<del>7421410</del>	<del>302-91</del>	<del>GE 5</del>	<del>1260</del>	<del>87</del>	<del>OE110186</del>
K516262R73A	303-91	GE 15		ND	OE110186
<del>8418478</del>	<del>304-91</del>	<del>GE 3</del>	<del>1260</del>	<del>20</del>	<del>OE110186</del>
67AC2448	305-91	WH 25	1260	1	OE110186
<del>1356061</del>	<del>306-91</del>	<del>WH 7.5</del>	<del>1260</del>	<del>3</del>	<del>OE110186</del>
7223157	307-91	RTE 5		ND	OE110187
2612306	308-91	WH 5	1260	1	OE110187
7958465	309-91	GE 5	1260	974	OE110187
909186	310-91	GE 3		ND	OE110187
7859478	311-91	GE 5	1260	819	OE110187
151078	312-91	RTE 15	1260	1	OE110187
<del>8418478</del>	<del>313-91</del>	<del>GE 10</del>	<del>1260</del>	<del>80</del>	<del>OE110187</del>

Lab Report #: E1100415

Page 1

Glenda Nelson

*Proposed*

## NATIONAL CHEM LAB PCB TEST REPORT

10/10/91

UTILITY SERIAL NO.	COMPANY #	MISC.	AROCLOR	PPM	NCL #
<del>5041348</del>	<del>341-91</del>	<del>AC 15</del>	<del>1260</del>	<del>14</del>	<del>OE1101900</del>
C592092	342-91	GE 7.5	1260	17	OE1101904
0127319	343-91	AC 15		ND	OE1101905
5545454	344-91	GE 3	1260	306	OE1101906
K490461K72A	345-91	GE 10		ND	OE1101907
7309-6012965	346-91	AC 10		ND	OE1101908
6010602	347-91	SPOK 10	1260	10	OE1101909
<del>5041348</del>	<del>348-91</del>	<del>RTE 15</del>	<del>1260</del>	<del>5</del>	<del>OE1101910</del>
602014974	349-91	RTE 15		ND	OE1101911
<del>7205552</del>	<del>350-91</del>	<del>RTE 15</del>		<del>ND</del>	<del>OE1101912</del>
7205552	351-91	RTE 15		ND	OE1101913
7205557	352-91	RTE 15		ND	OE1101914
3073461001	353-91	RTE 15		ND	OE1101915
146416177	354-91	ERM 25		ND	OE1101916
330223	355-91	WAG 3		ND	OE1101917
<del>7205552</del>	<del>356-91</del>	<del>RTE 50</del>		<del>ND</del>	<del>OE1101918</del>
4876593K-70 A	357-91	GE 25		ND	OE1101919
<del>9557338</del>	<del>358-91</del>	<del>GE 3</del>	<del>1260</del>	<del>1</del>	<del>OE1101920</del>
340238	359-91	WAG 3		ND	OE1101921
9418881	360-91	GE 1	1260	4	OE1101922
7310-6017607	361-91	AC 25		ND	OE1101923
682004038	362-91	RTE 5		ND	OE1101924
<del>682004038</del>	<del>363-91</del>	<del>RTE 5</del>		<del>ND</del>	<del>OE1101925</del>

*Glenda Nelson*

*Disposal*

NATIONAL CHEM LAB PCB TEST REPORT

08/15/91

148  
INLAND POWER & LIGHT  
E. 320 SECOND AVE.  
SPOKANE, WA 99202  
Attn: BILL BYRD

NATIONAL CHEM LAB  
103 12TH S.W.  
EPHRATA, WA 98823  
GLENDA NELSON, Chemist

Lab Report #: E1081313 PO number: 71065

Below is a listing of the samples received on 08/13/91 together with the laboratory results on their respective PCB content. Please contact the lab at 509-754-5725 if you have any questions regarding these sample results.

UTILITY SERIAL NO.	COMPANY #	MISC.	AROCLO	PPM	NCL #
<del>0000000</del>	<del>045-91</del>	<del>GE 7.5</del>	<del>1260</del>	<del>56</del>	<del>OE1082820</del>
E8554	246-91	SMD 15		ND	OE1082823
<del>702004206</del>	<del>247-91</del>	<del>RTE 50</del>		<del>ND</del>	<del>OE1082824</del>
F683911-63K	248-91	GE 10	1260	4	OE1082825
<del>0450005-68P</del>	<del>049-91</del>	<del>GE 10</del>	<del>1260</del>	<del>77</del>	<del>OE1082826</del>
G428303-65K	251-91	GE 15	1260	8	OE1082827
87028351	252-91	CH 50		ND	OE1082828
5810421	253-91	SPOK 10	1260	2	OE1082829
A7312A10AA1	254-91	WEST 10	1242/54	13	OE1082830
5278728	255-91	AC 10	1254	4	OE1082831
8816962	257-91	GE 7.5	1260	27	OE1082832
8988244	259-91	GE 7.5	1260	63	OE1082833
975942	260-91	LM 3		ND	OE1082834
8988239	261-91	GE 7.5	1260	63	OE1082835
1356907	262-91	LM 7.5	1254	3	OE1082836
3073751015	263-91	KUH 25		ND	OE1082837
55 GAL DRUM	265-91	TRANS OIL		ND	OE1082838
E994995-63P	267-91	GE 15	1242/54/60	14	OE1082839
55 GAL DRUM	270-91	RECLOS OIL 1254		1	OE1082840
<del>05 GAL DRUM</del>	<del>271-91</del>	<del>RECLOS OIL</del>		<del>ND</del>	<del>OE1082841</del>

Lab Report #: E1081313

Page 1

*Glenda Nelson*

# - CONTAINER IDENTIFICATION -

#	ITEM DRAINED OR PLACED INTO CONTAINER	SERIAL NUMBER	CONTENTS		QUANTITY GALS/LBS OR ITEMS	DATE REMOVED FROM SERVICE	DATE INTO DRUM
			MFG.	SIZE			
1	TRANS	D402037-59P	GE	10		10/23/91	11/11/91
2	TRANS	R34081970	RTE	25		11/4/91	11/11/91
3	TRANS	901094259	COOP	25		11/4/91	11/11/91
4	TRANS	D402041-59P	GE	15		10/23/91	11/11/91
5	TRANS	C307028	GE	7.5		10/23/91	11/11/91
6	TRANS	9795238	GE	15		11/26/91	11/26/91
7							
8							

**INSTRUCTIONS:**

DRUM NUMBER:
285-91

STORAGE DATE:
11/11/91

TEST RESULTS:
18 PPH

Sent For Disposal

Repaired

# -- CONTAINER IDENTIFICATION --

1 of 2

#	ITEM DRAINED OR PLACED INTO CONTAINER	SERIAL NUMBER	CONTENTS		QUANTITY GALS/LBS OR ITEMS	DATE REMOVED FROM SERVICE	DATE INTO DRUM
			MFG.	SIZE			
1	RECLOSE	54075	KYLE	35	2	12/5/91	12/5/91
2	"	56017	KYLE	50	2	12/5/91	12/5/91
3	"	48189	KYLE	35	2	12/5/91	12/5/91
4	"	54089	KYLE	35	2	12/5/91	12/5/91
5	"	48701	KYLE	35	2	12/5/91	12/5/91
6	"	60984	KYLE	35	2	12/5/91	12/5/91
7	"	77168	KYLE	15	2	12/5/91	12/5/91
8	"	239530	ME	50	3	12/5/91	12/5/91
INSTRUCTIONS:							

DRUM NUMBER:
418-91

STORAGE DATE:
12/5/91

TEST RESULTS:
N.D.

# -- CONTAINER IDENTIFICATION --

2 of 2

#	ITEM DRAINED OR PLACED INTO CONTAINER	SERIAL NUMBER	CONTENTS		QUANTITY GALS/LBS OR ITEMS	DATE REMOVED FROM SERVICE	DATE INTO DRUM
			MFG.	SIZE			
1	RECLOSE	251305	M.E.	50	3	12/5/91	12/5/91
2	"	69175	ME	25	3	12/5/91	12/5/91
3	"	142473	ME	25	3	12/5/91	12/5/91
4	"	141703	ME	70	5	12/5/	12/5/91
5	"	57653	ME	70	5	12/5/	12/5/91
6	"	141704	ME	70	5	12/5/	12/5/91
7	"	141702	ME	70	5	12/5/	12/5/91
8	"	141748	ME	70	5	12/5/	12/5/91
INSTRUCTIONS:							

DRUM NUMBER:
418-91

STORAGE DATE:
12/5/91

TEST RESULTS:
N.D.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

APR 26 1993

*File*  
**FILE COPY**

Reply to the  
Attention of M/S AT-083

Richard Heitman, General Manager  
Inland Power and Light Company  
Box 4429  
Spokane, Washington 99202

Dear Mr. Heitman:

This concerns Uniform Hazardous Waste Manifest number 09251 which manifested certain transformers to Ross Electric of Washington, Inc., from Inland Power and Light Company, on December 13, 1991. The Manifest identified on line 11(c) transformers containing "O/500 ppm." In addition, the manifest indicated in Box 15 that "regulated materials re-manifested to ESII." We are presuming that the notation "O/500 ppm" means that the transformers contained greater than 500 parts per million PCB (polychlorinated biphenyl).

Ross Electric of Washington, Inc., has indicated that they received no regulated material on this manifest. In this regard, please identify the waste which was manifested to Ross Electric of Washington, Inc., and described on line 11(c) of this manifest. Please provide a complete description of any equipment, including make, serial number, and PCB (polychlorinated biphenyl) concentration, of such equipment.

Please provide the requested information within two weeks of your receipt of this letter. If you have any questions, please call me at (206) 553-7369.

Sincerely,

William M. Hedgebeth  
PCB Team Leader  
Toxic Substances Section

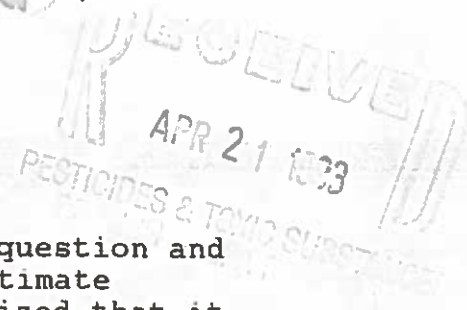
cc: Joe Ryan

United State E. A.  
Region 10  
1200 Sixth Avenue  
Seattle, WA 98101  
ATTN: William M. Hedgebeth

Inland Power + Light

APR 6, 1993

BH



Dear Mr. Hedgebeth:

Enclosed are copies of the manifests in question and support documents showing the tracking and ultimate disposal of listed items. Ross Electric realized that it did not have approval from EPA for either the commercial storage or disposal of PCB's.

I will attempt to explain our deficiencies which have been applied in this time frame and that our communication with disposal sites were in error for combinations of loads. Also attached you will find is the certificate of disposal/incineration for each manifest in question.

1. #09251, Inland Power & Light Co. WAD988472031  
We received for incineration at 1015 Logan Hill Road referenced in 11. a & d, Transformers and Materials are less than 50 parts per million. 11. b. & c. show no regulated materials were received by Ross Electric.
2. #09241, PUD No1 of Wahkiakum County WAD008957292  
We received for incineration at 1015 Logan Hill Road referenced in 11. a & b, Transformers less than 50 ppm and units less than 500 ppm. The oil was removed and placed into drums. As #09243 denotes in box #15 Ross Electric picked-up these drums on Jan. 24, 1992 (box #18) and disposed of them on Jan. 28, 1992.
3. #09235, Benton Rural Electric Association WAD003547015. We received for incineration at 1015 Logan Hill Road referenced in 11. a & c, transformers less than 50 ppm and transformers less than 500 ppm. Oil from the 4 units was left at Benton County and taken to ESII on 12/12/91 via manifest # 09263.
4. #09226, Midstate Electric Cooperative, Inc. ORD002773638. We received for incineration at 1015 Logan Hill Road referenced in 11. a, b, & c, transformers less than 50 ppm, transformers less than 500 ppm and waste debris less than 50 ppm. The mineral oil from transformers listed in 11. b was listed on manifest #09230 combined with other utilities waste.
5. #09229, Sun Mountain Lodge, Used 40CFRPART761 as an ID Number. We received for incineration at 1015 Logan Hill Road referenced in 11. a, 1 transformer less than 500 ppm (400 ppm, not 4000 ppm). The oil from the unit was listed on manifest #09233 combined with other utilities waste.

United State E. A.  
Region 10  
1200 Sixth Avenue  
Seattle, WA 98101  
ATTN: William M. Hedgebeth

April 16, 1993

6. #09231, Consumers Power, Inc.  
ORD002797041. We received for incineration at 1015 Logan Hill Road referenced in 11. a. transformers less than 50 ppm. 11. b. transformers less than 500 ppm.  
11. c. references transformers over 500 ppm and 15. c. shows disposal at ESII under manifest 09233 as box number 19 indicates.  
11. d. references mineral oil over 50 ppm and 15. c. shows disposal at ESII under manifest 09233 as box number 19 indicates which is a combined load.
7. #91098, Lane Electric Cooperative, Inc.  
ORD987175668  
We received for incineration at 1015 Logan Hill Road referenced in 11. a. transformers less than 500 ppm. 11. b waste oil less than 50 ppm. 11. c. non-PCB capacitors. 11. d. transformers over 500 ppm transferred to manifest 09195 which is a combined load.
- 7a. #09143, Lane Electric Cooperative, Inc.  
ORD987175668  
We received the materials listed in a, b, & c at 1015 Logan Hill Road but only handled the materials as storage, that being seven days. Materials were combined with other utilities referenced on 09144 and properly disposed of.

The tracking of materials in the above fashion seemed to be clear to us and the disposal site and was done this way for approximately 8 months.

We hope this clarifies our deficiencies in manifest reporting. Envirosafe Services of Idaho, Inc. has worked with us to develop the correct procedures beginning in 1992.

If you have any further questions, please contact Bob Ross at 1-800-245-6905.

Sincerely,

  
Bob Ross  
Secretary

**UNIFORM HAZARDOUS  
WASTE MANIFEST**

1. Generator's USEPA ID No

Manifest  
Document No.2. Page 1  
of 1Information in the shaded areas  
is not required by Federal law.

W A D 9 8 0 8 3 5 2 6 8

## 3. Generator's Name and Mailing Address

Inland Power & Light Co.  
Box 4429, Spokane, Wa. 99202

4. Generator's Phone ( 509 ) 747-7151

A. State Manifest Document Number

B. State Generator's ID

## 5. Transporter 1 Company Name

ROSS ELECTRIC OF WA., INC.

6. US EPA ID Number

W A D 9 8 0 8 3 5 2 6 8

C. State Transporter's ID

D. Transporter's Phone 206-748-6932

## 7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

## 9. Designated Facility Name and Site Address

Ross Electric of Wash., Inc.  
1015 Logan Hill Road  
Chehalis, Wa. 98532

10. US EPA ID Number

W A D 9 8 0 8 3 5 2 6 8

G. State Facility's ID

H. Facility's Phone

(206) 748-5932

## 11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

12. Containers

13. Total  
Quantity14. Unit  
Wt/Vol

1. Waste No.

a. Dangerous Waste Liquid nos ORM-E  
NA9188  
(Scrap Transformers) L/50 ppm

No.

Type

40

CM

4600

K

W001

b. Dangerous Waste Liquid nos ORM-E  
NA9188  
(Scrap Transformers) L/500 ppm

10

CM

10

K

W001

c. Dangerous Waste Liquid nos ORM-E  
NA9188  
(Transformers) O/500 ppm

10

CM

10

K

W001

d. Dangerous Waste nos ORM-e  
NA9188  
(Waste Materials)

3

DM

430

K

W001

## J. Additional Descriptions for Materials Listed Above

a. Transformers L/50 ppm  
b. Transformers L/500 ppm  
c. Transformers O/500 ppm  
d. Materials drummed L/50

K. Handling Codes for Wastes Listed Above

## 15. Special Handling Instructions and Additional Information

Regulated materials re-manifested to ESI

No Regulated materials  
Bob Ross

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Month Day Year

Todd H. Hoff

Todd H. Hoff

12/21/91

## 17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

GERALD ROSS

Gerald Ross

1/21/92

## 18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

## 19. Discrepancy Indication Space

385-91  
418-9118 ppm  
18 ppm12/24/91  
12/24/91

## 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

Bob Ross

Bob Ross

1/21/92

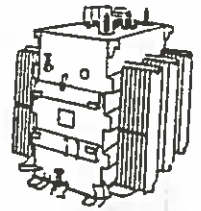
GERALD ROSS  
President

CURT ROSS  
Vice President

BOB ROSS  
Secretary/Treasurer

# Ross Electric of Wa., Inc.

P.O. Box 905  
Chehalis, Washington 98532  
Call Collect (206) 748-6932



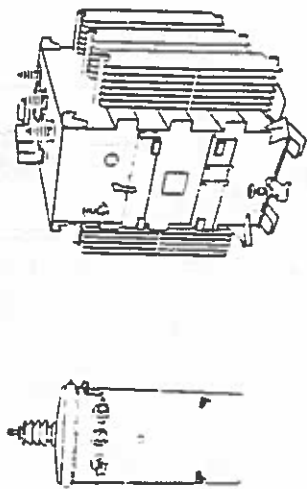
## INLAND POWER & LIGHT CO.

MANIFEST NUMBER 09251  
ARRIVAL DATE 12/13/91

KVA	MAKE	SERIAL NUMBER	PPM	CORE REMOVED	DESTROYED
7.5	WEST.	645693	ND	12/16/91	12/24/91
7.5	WEST.	2402888	2	12/16/91	12/24/91
7.5	WEST.	2614323	2	12/16/91	12/24/91
7.5	G.E.	9394253	ND	12/16/91	12/24/91
7.5	G.E.	C-311387	9	12/16/91	12/24/91
7.5	G.E.	C-307028	18	12/16/91	12/24/91
10	G.E.	9857017	ND	12/16/91	12/24/91
10	G.E.	D-402037-59P	18	12/16/91	12/24/91
10	G.E.	9292136	4	12/16/91	12/24/91
10	G.E.	B186608	13	12/16/91	12/24/91
10	G.E.	F683911-63K	4	12/16/91	12/24/91
10	WEST.	9461042	2	12/16/91	12/24/91
10	WEST.	6920554	ND	12/16/91	12/24/91
10	WEST.	2618432	4	12/16/91	12/24/91
10	RT&E	682014974	ND	12/16/91	12/24/91
10	RT&E	12905A2	ND	12/16/91	12/24/91
15	SPOKANE	S-680208C	33	12/16/91	12/24/91
15	G.E.	K-516262K73A	ND	12/16/91	12/24/91
15	CENTRAL	D-402041-59P	18	12/16/91	12/24/91
15	CENTRAL	AL-7127-11	6	12/16/91	12/24/91
15	WEST.	2614323	2	12/16/91	12/24/91
25	G.E.	831081970	18	12/16/91	12/24/91
25	G.E.	H876593K70A	ND	12/16/91	12/24/91
25	WEST.	67AC2448	1	12/16/91	12/24/91
RECLOSERS NON-DETECTABLE					
54025	56017	48189	54089	12/16/91	12/24/91
48701	60984	77168	239530	12/16/91	12/24/91
251305	69175	142473	141703	12/16/91	12/24/91
57653	141704	141702	141748	12/16/91	12/24/91
55 GALLON DRUMS					
385-91	18 PPM				12/24/91
418-91	ND PPM				12/24/91

795 KVA  
16 x 15.5  
2 drums oil  
110 gallon

EPA ID WAD# 980835268  
Incineration Permit No. -83-L-33R



## ROSS ELECTRIC OF WASHINGTON, INC. CERTIFICATE OF INCINERATION

Ross Electric of Washington, Inc. has incinerated the electrical materials received from INLAND POWER & LIGHT CO.

on the 13th day of DECEMBER 1991. As identified in Hazardous Waste Manifest # 09251 and hereby certifies such incineration as of this 24th day of DECEMBER 1991.

Generator Inland Power & Light Co. By R. A. Ross

Address P.O. Box 4429 Title Secretary

Spokane, Wa. 99202



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

FILE COPY

Reply to the  
Attention of M/S AT-083

APR 05 1993

CERTIFIED MAIL

Gary Ross, President  
Ross Electric of Washington, Inc.  
1015 Logan Hill Road  
Chehalis, Washington 98532

Dear Mr. Ross:

This is a follow-up to the March 8, 1993, Letter of Advisement sent to Ross Electric of Washington, Inc., regarding the January 23, 1992, Toxic Substances Control Act (TSCA) PCB (polychlorinated biphenyl) inspection conducted at that facility.

As we indicated in our letter, it appeared that a number of facilities had initially manifested TSCA-regulated PCB waste and identified Ross Electric of Washington, Inc., as the designated facility on the manifest. This is in violation of the federal PCB Regulations since Ross Electric does not have approval from EPA for either the commercial storage or disposal of PCBs.

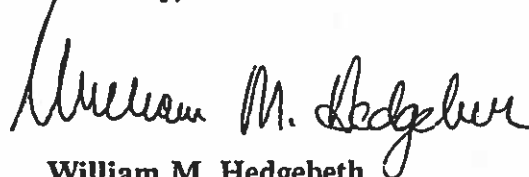
We are attempting to verify that the PCB waste at issue has been properly disposed of. In that regard, please provide us with the following documentation:

1. The manifest which remanifested to ESII (or other EPA-approved disposal facility) PCB waste originally identified on Uniform Hazardous Waste Manifest Number 09251, generator Inland Power and Light Co.
2. The manifest which remanifested to ESII (or other EPA-approved disposal facility) PCB waste originally identified on Uniform Hazardous Waste Manifest Number 09241, generator PUD No. 1 of Wahkiakum County. Manifest Number 09241 indicates that the second manifest number is 09242.

3. The manifest which remanifested to ESII (or other EPA-approved disposal facility) PCB waste originally identified on Uniform Hazardous Waste Manifest Number 09235, generator Benton Rural Electric Association.
4. The manifest which remanifested to ESII (or other EPA-approved disposal facility) PCB waste originally identified on Uniform Hazardous Waste Manifest Number 09226, generator Midstate Electric Cooperative, Inc.
5. The manifest which remanifested to ESII (or other EPA-approved disposal facility) PCB waste originally identified on Uniform Hazardous Waste Manifest Number 09231, generator Consumers Power, Inc.
6. The manifest which remanifested to ESII (or other EPA-approved disposal facility) PCB waste originally identified on Uniform Hazardous Waste Manifest Number 09229, generator Sun Mountain Lodge.
7. The manifest which remanifested to ESII (or other EPA-approved disposal facility) PCB waste originally identified on Uniform Hazardous Waste Manifest Numbers 91098 and 09143, generator Lane Electric Cooperative, Inc.

Please provide the requested information within two weeks of your receipt of this letter. If you have any questions, please call me at (206) 553-7369.

Sincerely,



William M. Hedgebeth  
PCB Team Leader  
Toxic Substances Section

cc: **Juliane Matthews**  
**Joseph Ryan**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

*File*  
**FILE COPY**

Reply to the  
Attention of M/S AT-083

**MAR 15 1993**

**MEMORANDUM**

**SUBJECT:** TSCA Referral for Administrative Civil Penalty: Inland Power and Light Co., Spokane, Washington

**FROM:** *for* Gil Haselberger, Chief  
Toxic Substances Section *William M. Hedgaber*

**TO:** Margaret B. Silver, Associate Regional Counsel

**THRU:** George Abel, Chief *GA*  
Pesticides and Toxic Substances Branch

On January 23, 1992, an EPA inspection was performed by W. Douglas Smith at Ross Electric of Washington, Inc., Chehalis, Washington. The inspection was carried out to assess compliance with the PCB Regulations adopted by EPA pursuant to the Toxic Substances Control Act (TSCA).

During the inspection, a number of documents were obtained, including manifests of PCB waste sent to Ross Electric of Washington, Inc., by various generators. One of the manifests obtained was Uniform Hazardous Waste Manifest Number 09251, identifying Inland Power and Light Co., Spokane, Washington, as the generator. A copy of this manifest is attached. A review of this manifest documented a violation of the PCB Regulations by Inland Power and Light Co. This violation and the associated regulations and requirements are set forth below and in the attached proposed civil complaint.

**REGULATION - MANIFESTING**

40 C.F.R. § 761.207(g) states that a generator shall designate on the manifest one off-site commercial storage or disposal facility approved under this part for the

commercial storage or disposal of the PCBs and PCB Items described on the manifest.

### **VIOLATION**

The generator, Inland Power and Light Co., identified Ross Electric of Wash., Inc., as the designated facility on Uniform Hazardous Waste Manifest Number 09251. The PCB waste identified on Line 11(c) of this manifest was regulated for disposal under 40 C.F.R. § 761.60. Ross Electric of Wash., Inc., does not have approval from EPA for either the commercial storage or disposal of PCB waste. The failure of Inland Power and Light Co., to designate on the manifest a facility which has approval from EPA for either the commercial storage or disposal of PCB waste constitutes a violation of 40 C.F.R. § 761.207(g).

### **Compliance History**

3/11/82      EPA Region 10 TSCA PCB inspection. No action taken.

### **Request for Action**

This assessment is being referred to you for consideration of enforcement action. An Administrative Civil Penalty appears to be in order because of the significance of the violation. Following is a Civil Penalty Assessment for the documented violation of TSCA.

### **Description of Current Alleged Violation**

Violation -	Improper Manifesting
Level -	One
Extent -	Minor (unknown quantity)
Penalty -	\$5,000

The TSCA Case Reviewer assigned to this case is William M. Hedgebeth, 3-7369.

Attachment

**VIOLATION ASSESSMENT - EPA REGION 10**

**William M. Hedgebeth/EPS**  
**NAME AND TITLE OF EVALUATOR**

**PROGRAM: TSCA (PCB)**

**FACILITY NAME AND ADDRESS**

Ross Electric of Washington, Inc.  
1015 Logan Hill Rd.  
Chehalis, Washington 98532-0905

	<b><u>ACTION TAKEN</u></b>
<input type="checkbox"/>	NO VIOLATION/CLOSURE
<input checked="" type="checkbox"/>	NO VIOLATION/ADVISORY
<input type="checkbox"/>	NOTICE OF NONCOMPLIANCE
<input type="checkbox"/>	FED PAC: NOTICE OF SIGNIFICANT NONCOMPLIANCE
<input type="checkbox"/>	REF: ADM. CIVIL PENALTY
<input type="checkbox"/>	REF: FED COMPLAINT
<input type="checkbox"/>	OTHER

**January 23, 1992**  
**DATE OF INSPECTION**

**W. Douglas Smith/ESD**  
**NAME OF INSPECTOR**

**COMMENTS**

**COMPLIANCE HISTORY**

3/19/84      TSCA PCB inspection.  
8/10/84      Letter of Advisement issued (re recordkeeping).  
  
3/12/85      TSCA PCB inspection.  
8/6/85      No-violation closure letter sent.

**VIOLATION ASSESSMENT - PAGE TWO**  
**ROSS ELECTRIC OF WASHINGTON, INC.**

<b>12/3/87</b>	<b>TSCA PCB inspection.</b>
<b>5/31/88</b>	<b>Administrative Complaint issued. Violations: storage, disposal, marking. Proposed Penalty: \$23,000</b>
<b>8/16/88</b>	<b>Agreed Order for Payment of Civil Penalties issued (consolidated with other case against Ross Electric dealing with Coal Creek site). Assessed Penalty: \$20,850. \$14,090 of the penalty was suspended and deferred on the condition that certain activities related to the remediation of the Coal Creek site (Superfund cleanup) were undertaken.</b>
<b>3/24/89</b>	<b>TSCA PCB inspection.</b>
<b>4/4/89</b>	<b>No-violation closure letter sent.</b>
<b>9/5/89</b>	<b>TSCA PCB inspection.</b>
<b>11/6/89</b>	<b>No-violation closure letter sent.</b>
<b>6/5/91</b>	<b>TSCA PCB inspection.</b>
<b>9/11/91</b>	<b>No-violation closure letter sent.</b>

**ANNUAL DOCUMENT (OR ANNUAL DOCUMENT LOG) ASSESSMENT**

**N/A - There is no documentation that would indicate that the facility is required to maintain PCB Annual Document Logs pursuant to either 40 C.F.R. § 761.180(a) or (b).**

**QUARTERLY (OR ANNUAL) INSPECTION/RECORD ASSESSMENT**

**N/A - There are no PCB Transformers in use or stored for reuse at the facility.**

**NOTIFICATION AND MANIFESTING ASSESSMENT**

**Notification**

**Ross Electric of Washington, Inc., notified EPA as a transporter and commercial storer of PCBs. Ross Electric did not submit an application for approval as a PCB commercial storer and therefore did not obtain interim approval as a TSCA PCB commercial storer.**

**VIOLATION ASSESSMENT - PAGE THREE**  
**ROSS ELECTRIC OF WASHINGTON, INC.**

**Manifesting**

On the following manifests, the generator identified Ross Electric of Washington, Inc., as the "designated facility." Each of these manifests manifested PCB waste regulated for disposal under 40 C.F.R. § 761.60(a). The generators violated 40 C.F.R. § 761.207(g), which requires the generator to designate a facility which has approval under TSCA for either the commercial storage or disposal of PCBs:

1. Manifest Number 09229, dated 10/28/91 or 10/29/92 (illegible), generator: Sun Mountain Lodge, Winthrop, Washington.
2. Manifest Number 09226, dated 10/24/91, generator: Midstate Electric Cooperative, Inc., Lapine, Oregon.
3. Manifest Number 09231, dated 10/31/91, generator: Consumers Power Inc., Philomath, Oregon.
4. Manifest Number 09235, dated 11/8/91, generator: Benton Rural Electric Association, Prosser, Washington.
5. Manifest Number 09241, dated 11/21/91, generator: PUD No. 1 of Wahkiakum County, Cathlamet, Washington.
6. Manifest Number 09242, dated 11/20/91, generator: Troy Power and Light, Troy, Montana.
7. Manifest Number 09251, dated 12/13/91, generator: Inland Power and Light Co., Spokane, Washington.
8. Manifest Number 00001, dated 10/24/91, generator: Byron Bethany Irrigation District, Byron, California

**OTHER REGULATORY ASSESSMENT**

No other regulatory concerns regarding Ross Electric of Washington, Inc., were documented during the inspection.

**PENALTY CALCULATION**

**Sun Mountain Lodge (a "dba" for Village Resorts, Inc.)**

Violation -	Improper Manifesting
Level -	One
Extent -	Significant (3,182 kilograms)
Penalty -	\$17,000

**VIOLATION ASSESSMENT - PAGE FOUR**  
**ROSS ELECTRIC OF WASHINGTON, INC.**

**Midstate Electric Cooperative, Inc.**

**Violation - Improper Manifesting**  
**Level - One**  
**Extent - Significant (2,565 kilograms)**  
**Penalty - \$17,000**

**Consumers Power, Inc.**

**Violation - Improper Manifesting**  
**Level - One**  
**Extent - Significant (5,900 kilograms)**  
**Penalty - \$17,000**

**Benton Rural Electric Association**

**Violation - Improper Manifesting**  
**Level - One**  
**Extent - Minor (at least 454 kilograms)**  
**Penalty - \$7,500 (\$5,000 plus 50% upward adjustment for previous final order)**

**Public Utility District No. 1 of Wahkiakum County**

**Violation - Improper Manifesting**  
**Level - One**  
**Extent - Major (6800 kilograms)**  
**Penalty - \$25,000**

**Inland Power and Light Co.**

**Violation - Improper Manifesting**  
**Level - One**  
**Extent - Minor (unknown quantity)**  
**Penalty - \$5,000**

**Troy Power and Light**

**N/A - Refer to EPA Region 8 for follow-up.**

DATE \_\_\_\_\_

From: WILLIAM HEDGEBETH (WHEDGEBE)  
To: JRYAN  
Date: Thursday, April 29, 1993 3:23 pm  
Subject: Inland Power and Light

4-29-93, 3:16 p.m.

Bill Byrd, Inland Power and Light, (509) 747-7151, X 211, called me in reference to April 26, 1993, letter asking for clarification on Manifest # 09251. Mr. Byrd indicated that he had been able to verify that no TSCA-regulated material was shipped to Ross Electric on this manifest, that the PCB Transformers identified on line 11(c) of this manifest were actually held back and shipped directly from Inland Power's own facility to the disposal facility. He is preparing a package documenting this information. I will make you a copy of this information when I receive it and we can determine if we want to decide not to issue the complaint.

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. WA 9808472031		Manifest Document No. 09251		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
		3. Generator's Name and Mailing Address <b>Inland Power &amp; Light Co. Box 4429, Spokane, Wa. 99202</b>		6. US EPA ID Number WA 980835268		A. State Manifest Document Number		B. State Generator's ID	
4. Generator's Phone ( 509 ) 747-7151		7. Transporter 1 Company Name <b>ROSS ELECTRIC OF WA., INC.</b>		8. US EPA ID Number		C. State Transporter's ID		D. Transporter's Phone <b>206-748-6932</b>	
5. Transporter 2 Company Name		9. Designated Facility Name and Site Address <b>Ross Electric of Wash., Inc. 1015 Logan Hill Road Chehalis, Wa. 98532</b>		10. US EPA ID Number WA 980835268		E. State Transporter's ID		F. Transporter's Phone	
						G. State Facility's ID		H. Facility's Phone <b>(206) 748-6932</b>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers		13. Total Quantity		14. Unit Wt/Vol		1. Waste No.	
a. <b>Dangerous Waste Liquid nos ORM-E NA9188 (Scrap Transformers) L/50 ppm</b>		40 dM		4600		K		WO01	
b. <b>Dangerous Waste Liquid nos ORM-E NA9188 (Scrap Transformers) L/500 ppm</b>		10 dM		100		K		WO01	
c. <b>Dangerous Waste Liquid nos ORM-E NA9188 (Transformers) O/500 ppm</b>		10 dM		100		K		WO01	
d. <b>Dangerous Waste nos ORM-e NA9188 (Waste Materials)</b>		3 dM		430		K		WO01	
J. Additional Descriptions for Materials Listed Above a. Transformers L/50 ppm b. Transformers L/500 ppm c. Transformers O/500 ppm d. Materials drummed L/50								K. Handling Codes for Wastes Listed Above	
15. Special Handling Instructions and Additional Information <b>Regulated materials re-manifested to BSII</b>									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name <i>Todd Holman</i>		Signature <i>Todd Holman</i>				Month Day Year 1/2/91			
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name <b>GERALD ROSS</b>				Signature <i>Gerald Ross</i>			
						Month Day Year 1/2/91			
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name				Signature			
						Month Day Year			
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name <i>R.L.P.</i>		Signature <i>R.L.P.</i>				Month Day Year 1/2/91			